1	Gabriel M. Ramsey (State Bar No. 209218)	Adam R. Alper (SBN 196834)
2	GRamsey@crowell.com Molly A. Jones (State Bar No. 301419) MoJones@crowell.com	Reza Dokhanchy (SBN 287684) KIRKLAND & ELLIS LLP 555 California Street
3	CROWELL & MORING LLP	San Francisco, California 94104
4	3 Embarcadero Center, 26th Floor San Francisco, CA 94111	adam.alper@kirkland.com reza.dokhanchy@kirkland.com
5	Telephone: 415.986.2800 Facsimile: 415.986.2827	Telephone: (415) 439-1400 Facsimile: (415) 439-1500
6	Attorneys for Defendants ESHARES, INC. DBA CARTA, INC., CARTA	Michael W. De Vries (SBN 211001) KIRKLAND & ELLIS LLP
7	CAPITAL MARKETS, LLC AND CARTA SECURITIES, LLC	555 South Flower Street, Suite 3700 Los Angeles, California 90071
8	MANATT, PHELPS & PHILLIPS, LLP	michael.devries@kirkland.com Telephone: (213) 680-8400
9	Christopher L. Wanger (CA Bar No. 164751) cwanger@manatt.com	Facsimile: (213) 680-8500 Attorneys for Plaintiff
10	One Embarcadero Center, 30 <sup>th</sup> Floor San Francisco, CA 94111	ALLROUNDS, INC.
11	Telephone: (415) 291-7400 Facsimile: (415) 291-7474	
12	Attorneys for Defendants,	
13	DFJ MANAGEMENT, LLC, THRESHOLD MANAGEMENT LLC, DFJ GROWTH	
14	MANAGEMENT, LLĆ, DRAPER FISHER JURVETSON MERCURY VENTURE	
15 16	PARTNERS, L.P., DRAPER ASSOCIATES, L.P., AND TIMOTHY DRAPER	
17	UNITED STATES DISTRICT COURT	
18	NORTHERN DISTRICT OF CALIFORNIA	
19	SAN FRANCISCO DIVISION	
20	ALLROUNDS, INC.,	Case No. 3:20-cv-07083-VC
21	PLAINTIFF,	JOINT STIPULATION AND
22	V. ESHARES, INC. D/B/A CARTA, INC., CARTA	[PROPOSED] ORDER EXTENDING TIME FOR DEFENDANTS TO
23	CAPITAL MARKETS, LLC, CARTA SECURITIES, LLC, DFJ MANAGEMENT, LLC,	RESPOND TO COMPLAINT AND FOR BRIEFING SCHEDULE ON MOTION TO DISMISS
24	THRESHOLD MANAGEMENT LLC, DFJ GROWTH MANAGEMENT, LLC, DRAPER EISTER HIPVETSON MEDICIPLY VENTURE	MOTOT TO BISHIES
25	FISHER JURVETSON MERCURY VENTURE PARTNERS, L.P., DRAPER ASSOCIATES, L.P., AND TIMOTHY DRAPER,	
26	Defendants.	
27		JOINT CTIDUI ATION AND IDDODOGED OFFI
28		JOINT STIPULATION AND [ <del>PROPOSED</del> ] ORDER EXTENDING TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT AND FOR BRIEFING
		COMPANIE ON MORION TO THE TIES

SCHEDULE ON MOTION TO DISMISS;

CASE NO. 3:20-CV-07083-VC

1	Plaintiff, AllRounds, Inc. ("Plaintiff"); Defendants eShares, Inc. dba Carta, Inc., Carta	
2	Capital Markets, LLC, Carta Securities, LLC; and Defendants DFJ Management, LLC, Threshold	
3	Management, LLC, DFJ Growth Management, LLC, Draper Fisher Jurvetson Mercury Venture	
4	Partners, L.P., Draper Associates, L.P., and Timothy Draper (collectively, "Defendants"), through	
5	their undersigned counsel of record, hereby stipulate, pursuant to Local Rule 6-1(a), that the time	
6	for Defendants to file and serve their responses to Plaintiff's First Amended Complaint in the	
7	above-captioned action is extended to December 10, 2020.	
8	Pursuant to Local Rule 6-2, Plaintiff and Defendants, by and through their respective	
9	counsel, further stipulate to the following request to extend time for briefing responsive to any	
10	motion to dismiss or other challenge to Plaintiff's First Amended Complaint filed by Defendants	
11	on December 10, 2020:	
12	WHEREAS, the current deadline for AllRounds to oppose said motion is December 24,	
13	2020 (see L.R. 7-3(a)), and the current deadline for Defendants' reply is December 31, 2020 (see	
14	L.R. 7-3(c));	
15	WHEREAS, the parties have conferred and request to move the deadline for AllRounds to	
16	oppose said motion to January 13, 2021, and the deadline for Defendants' reply to February 2,	
17	2021;	
18	WHEREAS, Defendants will notice said motion for a hearing on February 18, 2021;	
19	WHEREAS, the parties request this modest increase in time to allow sufficient time to	
20	address the forthcoming motion and to avoid unduly burdening either party during the upcoming	
21	holidays;	
22	WHEREAS, the parties previously stipulated to extend the deadline for Defendants other	
23	than Timothy Draper to respond to Plaintiff's original Complaint in this case to December 10,	
24	2020, and, therefore, this extension for Defendants to respond to Plaintiff's First Amended	
25	Complaint will not result in any delay. See Dkt. Nos. 38, 43.	
26	WHEREAS, the stipulated extensions do not affect the initial case management	
27		
28	JOINT STIPULATION AND [PROPOSED] ORDER	

1	conference, currently scheduled for January 12, 2021, or any other deadlines in this case.		
2	NOW THEREFORE, the Parties hereby stipulate and request that the Court extend the		
3	deadline for AllRounds to oppose Defendants' motion to January 13, 2021, and extend the		
4	deadline for Defendants' reply to February 2, 2021.		
5	5		
6	Dated: December 2, 2020	CROWELL & MORING LLP	
7			
8	3	By: <u>/s/ Gabriel M. Ramsey</u> Gabriel M. Ramsey	
9		Attorneys for Defendants,	
10		eShares, Inc. dba Carta, Inc., Carta Capital Markets, LLC, Carta Securities, LLC	
11	Dated: December 2, 2020	MANATT, PHELPS & PHILLIPS, LLP	
12			
13		By: <u>/s/ Christopher L. Wanger</u> Christopher L. Wanger	
14		Attorneys for Defendants,	
15	5	DFJ Management, LLC; Threshold Management LLC; DFJ Growth	
16		Management, LLC; Draper Fisher Jurvetson Mercury Venture	
17		Partners, L.P., Draper Associates, L.P., and Timothy Draper	
18	Dated: December 2, 2020	KIRKLAND & ELLIS, LLP	
19		Rv. /s/Adam P. Alnar	
20		By: /s/ Adam R. Alper Adam R. Alper	
21		Attorneys for Plaintiff, AllRounds, Inc.	
22		Afficultus, fiic.	
23			
24			
25			
26			
27		JOINT STIPULATION AND [PROPOSED] ORDER	
28	-3-	EXTENDING TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT AND FOR BRIEFING SCHEDULE ON MOTION TO DISMISS;	

CASE NO. 3:20-CV-07083-VC

1 FILER'S ATTESTATION Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that the other above-2 3 named signatories concur in this filing. 4 Dated: December 2, 2020 CROWELL & MORING LLP 5 By: /s/ Gabriel M. Ramsey 6 Gabriel M. Ramsey 7 Attorneys for Defendants eShares, Inc. dba Carta, Inc., Carta Capital 8 Markets, LLC, Carta Securities, LLC 9 PURSUANT TO STIPULATION, IT IS SO ORDERED. AS MODIFIED 10 11 IT IS SO ORDEREI Dated: December 3, 2020 AS MODIFIED 12 Honoral 13 United St 14 The initial case management conference scheduled for January 12 is continued to Tuesday, 15 March 16 at 2 p.m. A joint case management statement is due by Tuesday, March 9. 16 17 18 19 20 21 22 23 24 25 26 27 JOINT STIPULATION AND [PROPOSED] ORDER 28 EXTENDING TIME FOR DEFENDANTS TO -4-

RESPOND TO COMPLAINT AND FOR BRIEFING SCHEDULE ON MOTION TO DISMISS: CASE NO. 3:20-CV-07083-VC